REMARKS

This response is intended as a full and complete response to the final Office Action mailed September 6, 2005. In the Office Action, the Examiner notes that claims 1-4, 5, 7-14 and 16-38 are pending and rejected. By this response, Applicant has amended claims 1, 4-5, 11, 19, 24, 27, and 35. By this response, claims 7 and 23 are cancelled. No new matter has been entered.

In view of both the amendments presented above and the following discussion, Applicant submits that none of the claims now pending in the application are anticipated under the provisions of 35 U.S.C. §102.

It is to be understood that Applicant, by amending the claims, does not acquiesce to the Examiner's characterizations of the art of record or to Applicant's subject matter recited in the pending claims. Further, Applicant is not acquiescing to the Examiner's statements as to the applicability of the art of record to the pending claims by filing the instant responsive amendments.

Rejection Under 35 U.S.C. §102

Claims 1, 4, 5, 7-14 and 16-38

The Examiner has rejected claims 1, 4, 5, 7-14 and 16-38 under 35 U.S.C. §102(e) as being anticipated by Boughner et al. (U.S. Patent No. 5,983,001, hereinafter "Boughner"). Applicant respectfully traverses the rejection.

In general, Boughner teaches a method and system for creating a test script. As taught in Boughner, after a user requests the automatic creation of a test script, when the user enters data on a graphical user interface the data is sent to a display server which manages the input and output on the graphical user interface. The display server creates an event corresponding to the type of input entered on the graphical user interface. In order to examine the context within which the event occurred, Boughner teaches interposing a new version of a routine into the system so that the new version of the routine is called when the GUI program attempts to retrieve the event. The interposed version of the routine examines the event, extracts relevant information regarding the event, and uses the information regarding the event for creating a test script. (Boughner, Abstract).

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Boughner, however, fails to teach or suggest any of the limitations of Applicant's invention of at least claim 1. Namely, Boughner fails to teach or suggest at least the limitations of "generating stimulus values by processing system requirements, the system requirements including a plurality of system rules by which the system operates, wherein at least a portion of the stimulus values comprise values conflicting with at least a portion of the system rules and generating a model of a computer component object behavior by processing the system requirements and testing requirements," as taught in Applicant's invention of at least claim 1. Specifically, Applicant's claim 1 positively recites:

"1. A method of generating a test script for testing at least a portion of a system, comprising:
    generating stimulus values by processing system requirements, the system requirements including a plurality of system rules by which the system operates, wherein at least a portion of the stimulus values comprise values conflicting with at least a portion of the system rules;
    generating a model of a computer component object behavior by processing the system requirements and testing requirements; and
    converting the stimulus values and the model of the computer component object behavior into a test script."
(Emphasis added.)

By contrast, Boughner merely teaches that, after a user requests automatic creation of a test script, the test script is created by processing representations of manual user actions performed by a user using a graphical user interface (GUI). Specifically, Boughner teaches that "[f]irst, a user of the system has initiated a request to enter a "capture" mode that automatically creates a test script based on user inputs entered during capture mode...The display server 217 examines the input, determines what action was taken on the GUI 209, and creates a corresponding event...retrieves information regarding the type of input device used to take the action on the GUI 209...[and] information retrieved from the event is converted to the event description protocol and sent to the test script generator where the information is used to create test script commands." (Col. 5, Lines 15-17; Col. 5, Lines 30-32; Col. 6, Lines 36-37; Col. 6, Lines 50-53).

In other words, as taught in Boughner, as the user performs manual actions on a GUI, the manual user inputs are examined in order to determine the actions taken on

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the GUI (e.g., mouse clicks, item selection, and similar GUI actions). A corresponding event, i.e., a representation of the actions taken on the GUI, is created and stored using a standard event description protocol. If the user has requested a test script generation, the stored events are then examined and <u>the information retrieved from the stored events is used to create the test script commands</u>. In other words, the only portion of the Boughner reference which may be construed as a stimulus values are the manual actions performed by the user in the GUI.

The <u>manual user actions</u>, as taught in Boughner, are simply not stimulus values <u>generated by processing system requirements</u>, as taught in Applicant's invention of at least claim 1. The detection of manual actions and representing the manual actions using a defined format, as taught in Boughner, is not processing system requirements, much less processing system requirements for generating stimulus values. Although system requirements may have been used for developing the manual action capture capabilities of Boughner, system requirements themselves are never processed in the Boughner arrangement; rather, such system requirements merely enabled the manual action capture capabilities to be implemented. In other words, using a protocol having a defined message format for representing manual user actions captured from a GUI, as taught in Boughner, is simply not generating stimulus values <u>by processing system requirements</u>, as taught in Applicant's invention of at least claim 1. As such, Boughner fails to teach or suggest at least the limitation of "generating stimulus values by processing system requirements," as taught in Applicant's invention of at least claim 1.

As such, Boughner is completely devoid of any teaching or suggestion of system requirements, much less system requirements including a plurality of system rules by which the system operates. Furthermore, Boughner is completely devoid of any teaching or suggestion of stimulus value which conflict with any system requirements, much less conflict with system rules of which the system requirements are composed. As described hereinabove, the manual user actions as taught in Boughner are not stimulus values generated by processing system requirements, as taught in Applicant's invention of at least claim 1. Furthermore, since the manual user actions of Boughner are performed by a user using the system, the manual user actions simply cannot conflict with system rules. As such, even if the manual actions of Boughner did teach

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stimulus values (which Applicants maintain they do not), the manual actions simply could not conflict with system rules and, therefore, Boughner would still fail to teach or suggest that at least a portion of the stimulus values conflict with at least a portion of the system rules, as taught in Applicants' invention of at least claim 1.

As described hereinabove, the events which represent manual actions performed by a user using a GUI, as taught in Boughner, are not system requirements. Similarly, such events are not testing requirements. In fact, the capturing, representing, and storing of manual actions using a defined format has absolutely nothing to do with processing of any requirements whatsoever. Furthermore, processing of events to create a test script, as taught in Boughner, merely teaches that the test script created in Boughner is designed to simulate the manual actions performed by the user. The simulation of manual actions performed by a user (by processing a computer-based representation of the manual actions) clearly does not require separate testing requirements, much less processing of testing requirements. Boughner fails to teach or suggest any testing requirements whatsoever. As such, representing manual user actions captured from a GUI as events and processing the events for creating a test script which simulates the manual user actions, as taught in Boughner, is simply not generating a model of a component object behavior by processing system requirements and testing requirements, as taught in Applicant's invention of at least claim 1.

Moreover, since, as described hereinabove, Boughner is completely devoid of any teaching or suggestion of both of Applicant's limitations of generating stimulus values by processing system requirements and generating a model of a computer component object behavior by processing system requirements and testing requirements, Boughner must therefore be completely devoid of any teaching or suggestion of converting the stimulus values and the model of a computer component object behavior into a test script, as taught in Applicant's invention of at least claim 1. As such, Boughner fails to teach each and every element of Applicant's invention of at least claim 1.

"Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim" (Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 730 F.2d 1452, 221 USPQ

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481, 485 (Fed. Cir. 1984) (citing <u>Connell v. Sears, Roebuck & Co.</u>, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)) (emphasis added). The Boughner reference fails to disclose <u>each and every element</u> of the claimed invention, <u>as arranged</u> in the claim.

As such, Applicant submits that independent claim 1 is not anticipated and fully satisfies the requirements of 35 U.S.C. §102 and is patentable thereunder. Furthermore, independent claims 11, 19, 27, and 35 recite features similar to the feature of claim 1 described above. As such, for at least the same reasons discussed with respect to claim 1, Applicant respectfully submits that independent claims 11, 19, 27, and 35 are also not anticipated and fully satisfy the requirements of 35 U.S.C. §102 and are patentable thereunder. Furthermore, claims 4, 5, 7-10, 12-14, 16-26, and 28-38 depend, either directly or indirectly, from independent claims 1, 11, 19, 27, and 35 and recite additional limitations therefor. As such and for at least the same reasons as discussed above, Applicant submits that these dependent claims are also not anticipated and fully satisfy the requirements of 35 U.S.C. §102 and are patentable thereunder. Therefore, Applicant respectfully requests that the Examiner's rejection be withdrawn.

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CONCLUSION

It is respectfully submitted that all the rejections have been overcome and that this application is in condition for allowance. Reconsideration of this application and its allowance are respectfully solicited.

If, however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, it is requested that the Examiner telephone Michael Bentley at (732) 383-1434 or Eamon J. Wall, Esq. at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

Dated: _12/6/05_

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